

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

SARAH MOLINA, <i>et al.</i>)	
)	
Plaintiffs,)	Case No. 4:17-cv-2498-AGF
)	
v.)	
)	
CITY OF ST. LOUIS <i>et al.</i>,)	
)	
Defendants.)	

DEFENDANTS’ MOTION TO STRIKE DOCUMENTS 183-7, 8, 11, 15, AND 25

COME NOW Defendants City of St. Louis (“City”), Daniel Book, Joseph Busso, Lance Coats, Stephen Dodge, Joseph Mader, Michael Mayo, Mark Seper, and William Wethington, by and through their attorney Julian Bush, City Counselor for the City of St. Louis, and pursuant to Rule 37(c)(1) of the Federal Rules of Civil Procedure, hereby submit this Motion to Strike Documents 183-7, 8, 11, 15, and 25. In support thereof, the following statements are made:

1. Plaintiffs’ Response to Defendants’ Motion for Summary Judgment relies, in part, upon depositions, declarations, and testimony excerpts from other cases, which counsel for Defendants was not present for and never agreed could be used in this matter.
2. Plaintiff also relies on the Declaration of Suzanne Brown, dated December 3, 2014 (Doc. 182-11), which, to counsel’s knowledge, was never produced in this case prior to its attachment in response to Defendants’ Motion for Summary Judgment.
3. Accordingly, these documents should be stricken and not considered.
4. A memorandum in support of this motion is filed herewith.

WHEREFORE, for all of the reasons set forth above, Defendants respectfully requests that this honorable Court strike Documents 183-7, 8, 11, 15, and 25.

Respectfully submitted,

JULIAN BUSH
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CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2020, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system.

/s/ Andrew D. Wheaton